

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

IN RE: BETTY L. MCCLANAHAN
Debtor

CASE NO. 16-62232

MOTION TO APPROVE SALE OF REAL ESTATE

To the Honorable Rebecca B. Connelly, United States Bankruptcy Judge:

Your Debtor, by counsel, represents to the Court as follows:

1. This Chapter 13 proceeding was filed by the Debtor on November 5, 2016. The hearing pursuant to §341 of the Bankruptcy Code was conducted on January 23, 2017. No plan has been confirmed by the Court.

2. As shown on the Amended Schedule A filed in this proceeding, the Debtor is the owner of several parcels of real estate located on 4th and 5th Streets, S.W. in the City of Charlottesville.

3. The Debtor has listed those properties for sale with Core Real Estate, LLC for a total of \$1,450,000.00, and that listing agreement was approved by Order of this Court, dated July 18, 2017.

4. The Debtor's proposed Amended Chapter 13 Plan, dated July 1, 2017 provides for the sale of those properties as the source of the funds to pay all allowed claims in this proceeding

5. The Debtor has accepted an offer from John Pritzlaff, IV to purchase the properties for a total of \$1,250,000.00, pursuant to a contract dated July 20, 2017. The purchase price is sufficient to pay all creditors' claims against the Debtor, as set forth in the Amended Proposed Plan.

6. The Debtor believes that this sale will be in her best interests, as it will provide for the satisfaction of all claims set forth in her proposed Plan.

WHEREFORE, your Debtor, by counsel, moves this Court for an Order approving the Agreement of Sale, dated July 1, 2017, and authorizing the Debtor to execute all documents and take all actions necessary to close the proposed sale.

Respectfully submitted,
BETTY L. MCCLANAHAN

By counsel

NOTICE OF HEARING

TAKE NOTICE that a hearing will be held on the foregoing Motion to Approve Sale of Real Estate on August 10, 2017 at 9:30 a.m. at the United States Bankruptcy Court, Courtroom 200, 255 West Main St., Charlottesville, VA 22902, at which time and place you may appear and be heard.

BETTY L. MCCLANAHAN

By counsel

/s/Douglas E. Little

DOUGLAS E. LITTLE, ATTORNEY AT LAW VSB#15238

710 East High St. (P.O. Box 254)

Charlottesville, VA 22902

434/977-4500

Counsel for the Debtor

CERTIFICATE

I certify that a true copy of the foregoing Motion and Notice of Hearing was mailed this 28th day of July, 2017 to all creditors and other parties shown on the Debtor's mailing matrix.

/s/Douglas E. Little